

Exhibit A

Subject: RE: 642 Individuals vs. NPC International, Inc.
Date: Monday, July 1, 2019 at 2:34:58 PM Eastern Daylight Time
From: AAA Heather Santo
To: Warren Postman, Tatum, Mark (SHB)
CC: Marquel Reddish, Sinatra, Katherine (SHB), Joanne Saint-Louis, JD
Attachments: image001.jpg, imageabadc4.PNG, image1ecd0f.JPG, Wire Transfer Information.pdf

Dear Counsel,

We understand that the mediation held on June 11, 2019 before Mediator Vering did not result in a settlement. However, Mediator Vering remains available to the parties should they wish to re-engage him.

The AAA is proceeding with the previously filed demands for arbitration and the 720 individual demands for arbitration filed on June 19, 2019. These 1,320 individual matters will be administered in accordance with the Employment Due Process Protocol and the AAA's Employment Arbitration Rules.

Pursuant to the Employment/Workplace Fee Schedule and the parties' arbitration agreement, which states in part: "NPC will pay that portion of the arbitration filing fee in excess of the similar court filing fee had [Claimants] gone to court", Respondent's portion of the initial arbitration filing fees is \$2,604,494.50. We request that Respondent remit payment of this amount on or before July 22, 2019.

Payment may be submitted via check, wire transfer or credit card. Attached are the AAA Wire Transfer instructions. If paying by check, please mail your payment to:

American Arbitration Association
13727 Noel Road, Suite 700
Dallas, TX 75240.

If you wish to pay by credit card, please contact me directly and I will provide an AAA Paylink.

Should you have any questions, please do not hesitate to contact me.

Sincerely,

Heather Santo



Heather Santo

American Arbitration Association

1301 Atwood Ave, Suite 211N, Johnston, RI 02919
T: 401 431 4703 F: 401 435 6529 E: heathersanto@adr.org
adr.org | icdr.org | aaamediation.org



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From: Warren Postman <wdp@kellerlenkner.com>

Sent: Wednesday, June 19, 2019 9:27 PM

To: Joanne Saint-Louis, JD <SaintLouisJ@adr.org>

Cc: AAA Heather Santo <heathersanto@adr.org>; Marquel Reddish <mpr@kellerlenkner.com>; Tatum, Mark (SHB) <MTATUM@shb.com>; Sinatra, Katherine (SHB) <KSINATRA@shb.com>

Subject: RE: 642 Individuals vs. NPC International, Inc.

***** External E-Mail – Use Caution *****

Ms. Saint-Louis,

As John Vering reported in his email last week, the parties were not able to resolve these matters in the global mediation scheduled for June 11, 2019. Claimants therefore wish to proceed with individual arbitrations without further delay.

In addition to the Claimants who previously filed demands, we are hereby serving demands for 720 additional Claimants. I have attached a general demand containing the information that is common to each Claimant, along with a spreadsheet (Exhibit A) containing the individual details for each Claimant demanding arbitration against NPC. The second column in Exhibit A shows which Claimants filed demands on April 11, 2019, and which are filing demands today. Relatedly, we are withdrawing 25 demands for clients who previously filed demands but for whom we do not wish to proceed with arbitration at this time. Those clients are listed on the “Withdrawals” tab in Exhibit A. This brings the total number of Keller Lenkner clients demanding arbitration against NPC to 1,320. The applicable arbitration agreement is attached as Exhibit B.

The parties’ agreement requires that arbitration proceed on an individual basis and provides that NPC will pay “that portion of the arbitration filing fee in excess of the similar court filing fee.” Exhibit A states our understanding of the “similar court filing fee” that would apply to each Claimant, and NPC’s corresponding share of the AAA filing fees. We will reach out to you separately to satisfy Claimants’ filing fee obligations, but have shared our assessment of these fee requirements for the sake of transparency with Respondent.

AAA has already indicated that Claimants may satisfy AAA’s filing requirements for individual arbitrations by serving a spreadsheet containing individualized information on each Claimant together with a single demand describing the common features of Claimants’ claims. Nonetheless, for avoidance of doubt, we have also prepared individual demands on AAA’s standard demand form for each Claimant that can be found at [this link](#) (password: KLNPCdemands). The demand number in the filename of each demand corresponds to the demand number in Exhibit A.

I have copied NPC’s outside counsel, Mark Tatum and Katherine Sinatra.

Please let me know if you require any additional information to move forward with administering these arbitrations.

Sincerely,

Warren D. Postman
Partner

Keller | Lenkner

1300 I Street, N.W., Suite 400E | Washington, D.C. 20005
[202.749.8334](tel:202.749.8334) | [Website](#) | [Email](#)

From: Vering, John A. <JVering@sb-kc.com>

Sent: Tuesday, June 11, 2019 4:41 PM

To: Joanne Saint-Louis, JD <SaintLouisJ@adr.org>; Warren Postman <wdp@kellerlenkner.com>; Marquel Reddish <mpr@kellerlenkner.com>; Tatum, Mark (SHB) <MTATUM@shb.com>; Sinatra, Katherine (SHB) <KSINATRA@shb.com>

Cc: AAA Heather Santo <heathersanto@adr.org>; Silvers, Sharon K. <sharons@sb-kc.com>; Leskoff, Helen S. <HLeskoff@sb-kc.com>

Subject: RE: 642 Individuals vs. NPC International, Inc.

Joanne, counsel for all parties and executives from Respondent met in good faith today but were unable to reach a settlement. It is possible that counsel will re-engage me to assist in future settlement negotiations.

John A. Vering
2323 Grand Boulevard, Suite 1000
Kansas City, MO 64108
Direct: 816.265.4109
Main: 816.421.4460
Cell: 816.898.3055
Fax: 816.474.3447
jvering@sb-kc.com
www.sb-kc.com



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